

UNITED STATES OF AMERICA  
DISTRICT COURT OF MASSACHUSETTS

DOCKET: 19-CR-10369-MLW

United States

v.

Bintu Toure

**MOTION TO EXTEND TIME TO FILE SENTENCE  
MEMO AND PERMISSION TO FILE UNDER SEAL**

NOW COMES the Defendant, Bintu Toure, and respectfully requests this Honorable Court allow the Defendant to file her Sentence Memo late on Monday April 5, 2021 and to file under seal. Defense Counsel has technology issues due to downed internet as a result of construction on the power lines on the street. This motion is prepared and filed by counsel's cell phone. Additionally, due to the contents of the material in the sentence memo as discussed in lobby at the plea hearing and as outlined in the government's filings, the defense seeks to file the sentence memo under seal due to the confidential nature of the material and the related safety concerns previously discussed.

WHEREFORE, the Defendant requests that this motion be Allowed.

The Defendant,

By her attorney,

/s/ CLMALCOLM

Christopher L. Malcolm

BBO: 684440

617-645-0089

clmalcolm@gmail.com

35 Nixon Road

Framingham, MA 01701

Date: 4/2/21

Certificate of Service

I, Christopher L. Malcolm, hereby certify that I served a copy of this motion to continue on the US Government by sending a copy by email on this date and electronic notice.

/s/ CLMALCOLM

Christopher L. Malcolm

Date: 4/2/21